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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

GLADYS HIDALGO, an individual;
SERGIO HILDALGO, an individual,

Plaintiffs,

v.

COSTCO WHOLESALE CORPORATION,
a foreign corporation d/b/a COSTCO
WHOLESALE; DOES 1 through 10; ROE
CORPORATIONS 11 through 20; and ABC
LIMITED LIABILITY COMPANIES 21
through 30, inclusive,

Defendants.

CASE NO.: 2:25-cv-00558-RFB-EJY

**JOINT DISCOVERY PLAN AND
SCHEDULING ORDER (SUBMITTED IN
COMPLIANCE WITH LR 26-1(b))**

1. Meeting. Pursuant to Federal Rules of Civil Procedure 26(f), a meeting was held on Wednesday, April 16, 2025, as it was properly noticed and it was attended by Michael A. Federico, Esq. of Olson Cannon & Gormley on behalf of Defendant COSTCO WHOLESALE CORPORATION and Sarah E. DiSalvo, Esq. of Christian Morris Trial Attorneys on behalf of Plaintiffs GLADYS HIDALGO and SERGIO HIDALGO.

2. Pre-Discovery Disclosures. The parties have exchanged the initial information.

3. Discovery Plan. The parties propose to the Court the following discovery plan:

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1 A. Changes to Timing. None

2 B. Subject of Discovery. Discovery will be needed on the following subjects:

3 (1) The events surrounding the alleged incident itself.

4 (2) Liability.

5 (3) The economic damage claims of the Plaintiff as a result of the alleged
6 incident.

7 (4) The physical and emotional injury claims of the Plaintiff.

8 (5) Causation of alleged damages.

9 C. Issues about Electronically Stored Information. None

10 D. Issues about privileges. None

11 E. Changes to Limitations on Discovery. None

12 F. Other Orders. None

13 G. Discovery Cut-Off Date(s). Due to multiple medical providers, serious medical
14 injuries and ongoing medical care for injuries as a result of a slip and fall while on Defendant's
15 property, discovery will take 180 days from the date of the Minute Order [#16], that being May
16 9, 2025. This means all discovery must be commenced in time to be completed by Wednesday,
17 November 5, 2025.

18 H. Amending the Pleadings and Adding Parties. The parties shall have until
19 Thursday, August 7, 2025, to file any motions to amend the pleadings or to add parties. This is
20 ninety (90) days before the discovery cut-off date.

21 I. Federal Rule of Civil Procedure 26(a)(2) Disclosures (Experts). Disclosure of
22 experts shall proceed according to Federal Rule of Civil Procedure 26(a)(2), except that:
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[I] The disclosure of experts and expert reports shall occur on Friday, September 5, 2025, which is sixty (60) days before the discovery cut-off date.

[ii] The disclosure of rebuttal experts and their reports shall occur on Monday, October 6, 2025, which is thirty (30) days before the discovery cut-off date.

J. Dispositive Motions. The parties shall have until Friday, December 5, 2025 to file dispositive motions. This is thirty (30) days after the discovery cut-off date and does not exceed the outside limit of thirty (30) days following the discovery cut-off date that LR 26-1(b)(4) presumptively sets for filing dispositive motions.

K. Pre-Trial Order. The Pre-Trial Order shall be filed by Monday, January 5, 2026, which is not more than thirty (30) days after the date set for filing dispositive motions in the case. In the event dispositive motions are filed, the date for filing the joint pre-trial order shall be suspended until thirty (30) days after decision of the dispositive motions or further order of the Court. The disclosures required by Federal Rules of Civil Procedure 26(a)(3) shall be made in the joint pre-trial order.

L. Extensions or Modifications of the Discovery Plan and Scheduling Order. LR 26-4 governs modifications or extensions of this discovery plan and scheduling order. Any stipulation or motion must be made no later than twenty-one (21) days before the discovery cut off date and comply fulling with LR 26-4, which is Wednesday, October 15, 2025.

M. Alternative Dispute Resolution. The parties certify that they have met and conferred about using Alternative Dispute Resolution processes but discovery is necessary to determine case issues.

N. Alternative Forms of Case Disposition. The parties certify that they have considered consent to Trial by a Magistrate Judge and use of the Short Trial Program.

O. Format of Discovery. Pursuant to the electronic discovery amendments to the Federal Rules of Civil Procedure effective December 1, 2006, the parties addressed the e-discovery issues pertaining to the format of discovery at the Rule 26(f) conference. The parties do not anticipate discovery of native files or metadata at this time, but each party reserves the right to make a showing for the need of such electronic data as discovery progresses.

DATED this 16th day of May, 2025.

DATED this 16th day of May, 2025.

OLSON CANNON & GORMLEY

CHRISTIAN MORRIS TRIAL ATTORNEYS

/s/ Michael A. Federico, Esq.

/s/ Sarah E. Disalvo, Esq.

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IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: May 16, 2025